

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: :  
Andrea M. Camarote : Chapter 13  
Debtor : Bankruptcy No. 24-13536 AMC

**TRUSTEE'S MOTION TO CONVERT CASE TO CHAPTER 7**  
**PURSUANT TO 11 U.S.C. SECTION 1307**

Scott F. Waterman, Esq., Standing Chapter 13 Trustee, by and through his attorney, Ann Swartz, Esq. files this Motion to Convert Case to Chapter 7 Pursuant to 11 U.S.C. § 1307 and in support thereof represents as follows:

1. This case was commenced by the filing of a Chapter 13 Petition on October 1, 2024.
2. Debtor has failed to make any Trustee payments.
3. Debtor's plan proposes to sell her home within six months, yet Debtor's Schedules indicate that she has no equity in her real estate, and Schedule J reflects she is not making any adequate protection payments to her mortgage lender, nor is she paying utilities and real estate insurance.
4. Debtor's secured lender is not adequately protected.
5. Debtor has not filed a tax return since 2021 and has no verifiable income to demonstrate any payment plan is feasible.
6. There does not appear to be a reorganizational purpose to this case being in Chapter 13.

7. It appears that the Debtor is eligible for a Chapter 7 Bankruptcy and that the Chapter 13 case was not filed in the best interest of the Debtor and that cause exists to convert the case to Chapter 7.

**WHEREFORE**, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, respectfully requests that an Order be entered converting this case to Chapter 7.

Respectfully submitted,

Date: December 16, 2024

/s/Ann Swartz  
Ann Swartz, Esq.  
for  
Scott F. Waterman, Esq.  
Standing Chapter 13 Trustee  
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